

LISA A. RASMUSSEN, ESQ.
Nevada State Bar No. 7491
LAW OFFICE OF LISA RASMUSSEN, P.C.
601 South 10th Street, Suite #100
Las Vegas, NV 89101
Tel: (702) 471-1436
Fax: (702) 489-6619
Lisa@LRasmussenLaw.com

MELANIE A. HILL, ESQ.
Nevada State Bar No. 8796
MELANIE HILL LAW PLLC
520 S. 7th Street, Suite A
Las Vegas, NV 89101
Tel: (702) 362-8500
Fax: (702) 362-8505
Melanie@MelanieHillLaw.com
Attorneys for Plaintiff Scott Friedman

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SCOTT FRIEDMAN, an individual,

Plaintiff,

v.

UNITED STATES OF AMERICA;
GENE M. TIERNEY, individually and
in his official capacity as an FBI Agent;
MATTHEW A. ZITO, individually and
in his official capacity as an FBI Agent;
THAYNE A. LARSON, individually and
in his official capacity as an FBI Agent;
LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; JOE LEPORE,
P#6260, individually and in his official
capacity as an officer of the LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT; DARREN HEINER,
P#2609, individually and in his official
capacity as an officer of the LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT; JASON HAHN, P#3371,
individually and in his official capacity
as an officer of the LAS VEGAS

Case No. 2:18-CV-000857-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
PLAINTIFF TO RESPOND TO
THE FBI AGENT DEFENDANTS'
MOTION TO STAY DISCOVERY [ECF
NO. 58]**

(First Request)

1 METROPOLITAN POLICE)
2 DEPARTMENT; Tali Arik, an individual;)
3 Julie Bolton, an individual; and Arik)
4 Ventures, an entity formed by Tali Arik,)
5 Defendants.)

6 IT IS HEREBY STIPULATED and AGREED by and between Defendants GENE M.
7 TIERNEY, MATTHEW A. ZITO, and THAYNE A. LARSON (hereinafter referred to
8 collectively as the “FBI Agent Defendants,”), by and through their counsel GREG
9 ADDINGTON, and Plaintiff SCOTT FRIEDMAN, by and through his counsel, MELANIE A.
10 HILL and LISA A. RASMUSSEN, that the deadline for Plaintiff to file a response to the FBI
11 Agent Defendants Motion to Stay Discovery [ECF No. 58] (“the Motion”) be extended to
12 Friday, September 7, 2018.

13 IT IS FURTHER STIPULATED and AGREED that the deadline for the FBI Agent
14 Defendants and Defendant United States, who filed a joinder to the FBI Agent Defendants
15 Motion, to file a reply in support of the Motion be extended to Tuesday, September 18, 2018.

16 This Stipulation is executed for the following reasons:

- 17 1. AUSA Addington filed a Motion to Dismiss [ECF No. 39] on behalf of the United
18 States *only* on July 26, 2018.
- 19 2. AUSA Addington filed a Motion to Dismiss [ECF No. 55] on behalf of the FBI
20 Agent Defendants on August 16, 2018.
- 21 3. The Plaintiff’s response to the United States and the FBI Agent Defendants’ Motions
22 to Dismiss is due on Friday, September 7, 2018.
- 23 4. Given that the Motion to Stay raises similar legal arguments that are also raised in
24 the FBI Agent Defendants’ Motions to Dismiss with respect to qualified immunity
25 and the sufficiency of Friedman’s complaint, Plaintiff is requesting a short extension
26 of the briefing schedule to address the arguments in each response simultaneously.

27 ///
28

1 5. The parties propose the following briefing schedule:

2 a. The deadline for Plaintiff to file a response to the Motion to Stay Discovery
3 [ECF No. 58] be extended from Tuesday, September 4, 2018 to Friday,
4 September 7, 2018.

5 b. The deadline for the FBI Agent Defendants and Defendant United States,
6 who filed a joinder to the FBI Agent Defendants Motion, to file a reply in
7 support of the Motion be extended to September 18, 2018.

8 6. The request for additional time in this Stipulation is made in good faith and not for
9 the purposes of delay.

10 Dated this 4th day of September, 2018.

11 Respectfully submitted by,

12
13 DAYLE ELIESON
14 UNITED STATES ATTORNEY

MELANIE HILL LAW PLLC

15 By: /s/ Greg Addington
16 GREG ADDINGTON
17 Assistant U.S. Attorney

By: /s/ Melanie A. Hill
MELANIE A. HILL
Attorney for Plaintiff Scott Friedman

18 LAW OFFICE OF LISA RASMUSSEN, P.C.

19
20 By: /s/ Lisa A. Rasmussen
21 LISA A. RASMUSSEN
22 Attorney for Plaintiff Scott Friedman
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

2
3
4
5

7
8
9

0
1
2

3

4

5
6